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7  
8 IN THE UNITED STATES DISTRICT COURT  
9  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$9,960.00 IN  
U.S. CURRENCY,

15 Defendant.

16 2:20-MC-00073-TLN-CKD

17 STIPULATION AND ORDER EXTENDING TIME  
18 FOR FILING A COMPLAINT FOR FORFEITURE  
19 AND/OR TO OBTAIN AN INDICTMENT  
20 ALLEGING FORFEITURE

21 It is hereby stipulated by and between the United States of America and potential claimant Tunisha  
22 Vance (“claimant”), by and through their respective counsel, as follows:

23 1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture  
24 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S.  
25 Currency (hereafter “defendant currency”), which was seized on October 26, 2019.

26 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
28 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has  
filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

29 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
30 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
31 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
2 That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8, 2020,  
4 the time in which the United States is required to file a civil complaint for forfeiture against the defendant  
5 currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September 7,  
7 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
9 forfeiture.

10 6. By Stipulation and Order filed September 3, 2020, the parties stipulated to extend to  
11 November 6, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
13 to forfeiture.

14 7. By Stipulation and Order filed October 30, 2020, the parties stipulated to extend to January  
15 5, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
16 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
17 forfeiture.

18 8. By Stipulation and Order filed December 31, 2020, the parties stipulated to extend to March  
19 6, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
21 forfeiture.

22 9. By Stipulation and Order filed March 3, 2021, the parties stipulated to extend to April 5,  
23 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
25 forfeiture.

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1       10. By Stipulation and Order filed March 31, 2021, the parties stipulated to extend to May 5,  
2 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
4 forfeiture.

5       11. By Stipulation and Order filed May 3, 2021, the parties stipulated to extend to August 3,  
6 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9       12. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
10 October 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
11 against  
12 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
13 forfeiture.

14       13. Accordingly, the parties agree that the deadline by which the United States shall be required  
15 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
16 the defendant currency is subject to forfeiture shall be extended to October 1, 2021.

17 Dated: 7/30/21

PHILLIP A. TALBERT  
Acting United States Attorney

19       By: /s/ Kevin C. Khasigian  
20 KEVIN C. KHASIGIAN  
21 Assistant United States Attorney

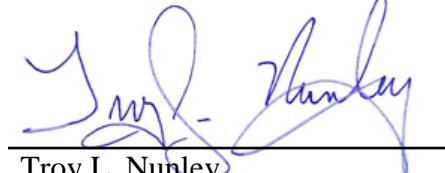
22 Dated: 7/30/21

23       /s/ Jacek W. Lentz  
24 JACEK W. LENTZ  
25 Attorney for potential claimant  
26 Tunisha Vance

27       (Signature authorized by email)

28       **IT IS SO ORDERED.**

Dated: July 30, 2021



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28       Troy L. Nunley  
\_\_\_\_\_  
United States District Judge